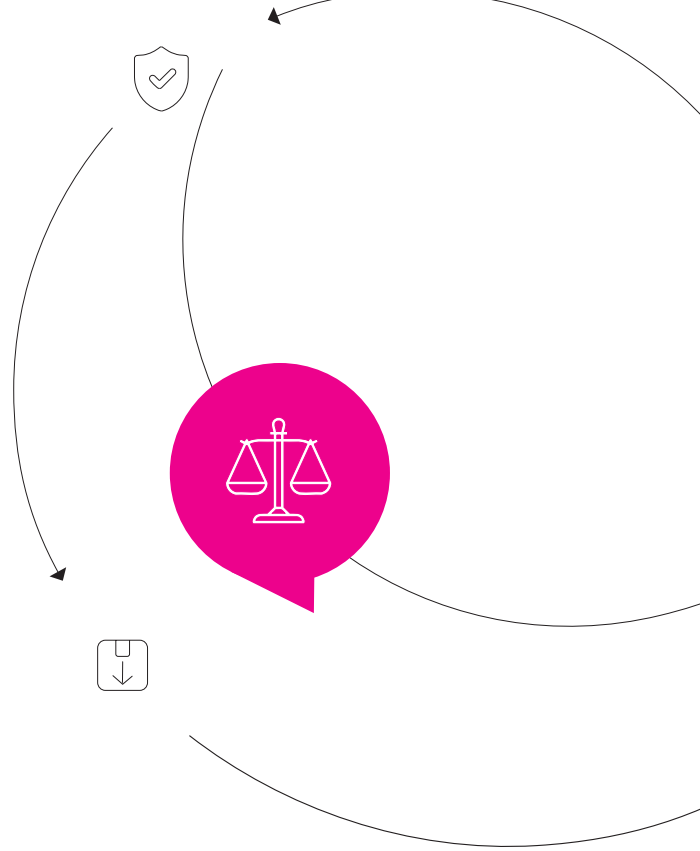


Irish Internet Hotline

Strategic Plan 2025 - 2028





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STRATEGY AT A GLANCE

Foreword

Since its establishment in 1999, the Irish Internet Hotline has been at the forefront of Ireland's fight against illegal and harmful online content, evolving continuously to meet the challenges posed by rapid technological advancement and increasingly sophisticated threats. In setting out this strategic plan, we acknowledge ourselves at a critical juncture, a moment filled with both considerable challenges and new opportunities to deepen Hotline's impact but also shape how Ireland responds to emerging online threats for years to come.

The online landscape has transformed dramatically over recent years. While technology brings unprecedented connectivity and innovation, it also presents new threats and complexities. Offenders have become more sophisticated, exploiting encrypted platforms and decentralised networks to evade detection. Meanwhile, the rapid evolution of artificial intelligence (AI) looms as a profound and emerging threat, with the capacity to accelerate the creation and spread of harmful content at a scale not yet fully realised and threatening to swamp current resources. That being said, regulatory frameworks across the European Union and within Ireland are undergoing significant change too, compelling us to rethink how we fulfil our mission. With regulation increasing, Hotline.ie will change and adopt to ensure that the skillsets of our staff continue to serve the mission and the people of Ireland and beyond.

Recognising these realities, our strategy marks a decisive shift from a largely reactive model to a more proactive, technologically advanced approach. Over the lifetime of this plan, the Irish Internet Hotline will undertake ambitious projects designed to enhance our capabilities, expand our partnerships, and actively promote a safer online environment. Central to everything we do will be the collaboration and support of our partners, from industry stakeholders and state bodies to the wider community and international allies.

On behalf of the management team and board of directors of Hotline.ie, we extend our deepest gratitude to everyone who contributed to this strategy. Your cooperation, encouragement, and inspiration have been invaluable as we strive towards our shared vision of a safer internet for all, especially children.

Brian Nisbet (Chair) and Mick Moran (CEO)

VISION MISSION OBJECTIVES



VISION OF IRISH INTERNET HOTLINE

A safer internet for
all, **especially children.**



MISSION OF IRISH INTERNET HOTLINE

To actively create a **hostile
online environment in
Ireland for illegal and
harmful content**, ensuring a
secure digital environment
through collaboration,
education, policy reform
and innovative solutions,
**with a special focus on
protecting children.**

Our Commitment

Hotline's role in monitoring the Internet and engaging with the public is crucial in creating a hostile environment for the hosting and dissemination of illegal and harmful content. Our actions lead to a reduction in the prevalence of illegal content online, breaking the cycle of abuse and exploitation, and contributing to the prevention of repeat victimisation. Removing illegal or harmful content also prevents the creation of more victims.

We achieve this through three key actions:



Strategic Context

For the past 26 years, the Irish Internet Hotline has served as Ireland's central reporting mechanism for illegal online content, beginning with Child Sexual Abuse Material (CSAM) and expanding to address financial scams, intimate image abuse, and racism & xenophobia. Governed by procedures developed in partnership with industry and state bodies, its reactive model — dependent on public reporting and manual analysis — has been instrumental in Ireland's fight against CSAM, ensuring compliance with national and international obligations.

Together with the Garda blocking list, it forms the backbone of Ireland's strategy to combat CSAM under the original Directive of the European Parliament and Council. Furthermore, by addressing a wider range of online harms—including financial scams, intimate image abuse, and racism & xenophobia—Hotline.ie has built a team with knowledge and skills base that not only reinforces its mission of a safer internet for all but also offers additional leverage for expanding its funding sources.

However, rapid technological advancements and evolving EU and Irish regulations now demand a reassessment of Hotline's strategy and approach.

Modern Threats

The digital ecosystem today bears little resemblance to that of 1999. Offenders exploit encrypted platforms, AI-generated content, and decentralised networks to distribute CSAM and other harmful content at an industrial scale, evade detection, and target victims. A reactive approach, reliant on public exposure to harmful material, leaves systemic gaps:

- **Exposure Risk:** Individuals, including minors, must encounter illegal content before reporting it, perpetuating harm.
- **Limitations:** Manual processes cannot match the speed or complexity of modern criminal networks, which exploit private environments, AI-generated content, and cross-border bouncing to evade detection.



Regulatory and Financial Pressures

Recent regulatory shifts:

- **EU Digital Services Act (DSA):** Mandates platforms to proactively detect and remove illegal content, prioritising partnerships with “trusted flaggers” like the Irish Internet Hotline.
- **EU CSAM Regulation:** If enacted, will require overhauling CSAM reporting workflows, including detection and takedown processes.
- **Irish OSMR Bill:** Established Coimisiún na Meán as a regulator, introducing compliance standards that may strain Hotline’s funding model.

The Irish Internet Hotline relies on a funding base that is mostly related to its work in CSAM and IIA. This limits opportunities to leverage the other aspects of the mandate for example financial scams and hate speech for diversified revenue.

These frameworks position the Irish Internet Hotline at a crossroads. While they validate its critical role, they also risk marginalising it if the organisation cannot adapt to new obligations. Platforms’ growing internal compliance capacities, coupled with offenders’ sophistication, threaten to bypass traditional reporting models.

Proactive model

The current operational model, effective in an era of limited online harms, is no longer fit for purpose. Proactive models, as demonstrated by counterparts like the UK’s IWF or the Canadian Cybertip.ca, combine advanced technologies with human expertise to identify threats before or early in public exposure. For Hotline.ie, modernising systems and partnerships is essential to maintaining regulatory compliance, operational relevance, and victim protection.



The Irish Internet Hotline relies on a funding base that is mostly related to its work in CSAM and IIA.

STRATEGY TO OUTCOMES

2025
→
2028

WE WILL BE
GUIDED BY THIS
STRATEGIC PLAN
TO DEVELOP
THE FOLLOWING
OUTCOMES:

1

Continuing to develop as the **Irish knowledge and expertise base** for online safety, especially in the area of online safety for children but also for Intimate Image Abuse, Racism & Xenophobia, financial scams along with other issues.

2

Further develop the Irish Internet Hotline team by creating an inclusive and caring working environment in which the team can **grow in skills and passion** about their work.

3

Seek **innovative and cutting-edge training** opportunities for staff.

4

To have the Online Child Sexual Exploitation and Abuse (OCSEA) recognised as a **cybersecurity** threat in Ireland.

5

To maintain and improve the existing reporting platform and to further develop proactive monitoring of the Internet.

6

Relaunch the Irish Internet Hotline through the development of a hierarchy of brands commensurate with the three functional areas:

- Sexual Crime
- Xenophobia, hate and terrorism
- Financial crimes

7

Renew our compact with the **Irish public** to be the place to go to report suspicious online content.

8

Continue to Analyse each report and work it to conclusion.

9

Demonstrating how we are a valuable resource in combatting **Intimate Image Abuse** by working to remove material and supporting victims in cooperation with other organisations combatting **Gender Based Violence** space.

10

Continue to **work with international partners** to action reports not being dealt with by others.

11

Engage as a full and involved partner in the **Safer Internet Centre** in Ireland, agreeing strong messaging and activities alongside Webwise, ISPCC Childline and NPC.

12

Increase collaboration with our current partners such as An Garda Síochána, internet service providers and online/hosting companies while **actively seeking** documented partnership agreements with relevant agencies and organisations in other areas. Document and improve our value to members.

13

Education and Awareness: Conduct educational programs and awareness campaigns to inform the public, especially children and parents, about online safety and the risks of harmful content.

14

Innovative Solutions: assist in the development of advanced technologies to detect and prevent the spread of illegal content online.

15

Policy Advocacy: Advocate for stronger policies and regulations to protect users, particularly children, from online harm.

16

Regular Evaluation: Continuously evaluate and improve strategies and tools to stay ahead of emerging online threats, including the taking of reports relating to them.

Strategy Pillars

This strategic plan was developed by engaging stakeholders across these 4 pillars and we commit to working closely with them during execution.

1

Governance & Operations

- **Ensure that** the Board and Management team remain united and committed to the vision of the Irish Internet Hotline.
- **Create and maintain** a professional people centred workplace that allows all staff members to develop and grow and to do their jobs to the best of their capabilities.
- **Establish our place** in the Irish regulatory space by seeking MOU's and Service Level Agreements with Government departments and regulators.
- **Manage change** carefully to ensure stability and buy-in for the current team and long-term sustainability for the organisation.
- **Continue to nurture** and develop our partnerships both within Ireland and globally.

2

Revenue & Fundraising

- **Work closer** with our members by communicating regularly with them, engaging and involving them more in what we do.
- **We will increase** our membership by offering more benefits and clearly communicating what we can do for potential members, especially those outside the Internet or telecoms sectors.
- We intend to **explore funding options**, including through applications **to relevant government departments**.
- **Honour our obligations** under the EU Better Internet for Kids (BIK+) and Safer Internet programs.

3

Marketing & Communications

- **Develop and execute** several campaigns aimed at each functional area audiences for both Hotline.ie and the Irish Safer Internet Centre.
- **Protect and develop** the current Hotline.ie brand.
- **Create sub-brands** cover the three functional areas of the Irish Internet Hotline.
- **Further develop** media relations, especially aimed at younger audiences.

4

Advocacy & Policy Development

- **Continue to develop** as a centre of excellence and knowledge on our subject areas especially CSAM and other sexually motivated crime.
- **Keep illegal and harmful online content** at the centre of our raison d'être.
- **Work with partners** to push for law and policy change in our functional areas.
- **Partner with academic institutions** to support research into relevant areas.

Conclusion

The Irish Internet Hotline faces significant operational and financial challenges driven by evolving EU regulations sophisticated criminal tactics, increased weaponisation of shared online spaces for illegal and harmful behaviour and an over-reliance on non-guaranteed funding sources.

To maintain its role as Ireland's central reporting platform for illegal and harmful online content, the organisation must urgently modernise its processes to address threats proactively, align with regulatory compliance requirements, and diversify revenue streams beyond EU grants and membership fees on which it currently depends.

We are a small team but we are dedicated to comprehensively implement this strategy through the development and execution of short and medium term action plans backed up by board supervision of stated KPIs and transparent review and monitoring.

In this way we can look forward to the next 25 years of improving online safety, especially for children, in Ireland and beyond.

